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 -- Admitted only in WI  
 ΔΔ Also admitted in CA  
 ° Also admitted in CO  
 ‡ Also admitted in CT  
 § Also admitted in DC  
 † Also admitted in FL  
 †† Also admitted in NJ  
 † Also admitted in PA  
 †† Admitted only in CA & UT  
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 EE Certified Atty. NJ Supreme Court

May 9, 2018

National Freedom of Information Officer  
 U.S. Environmental Protection Agency  
 1200 Pennsylvania Avenue, NW (2822T)  
 Washington, DC 20460

**Re: Freedom of Information Act Request**

Dear FOIA Officer:

Weitz & Luxenberg, P.C. files this request under the Freedom of Information Act ("FOIA").  
 Weitz & Luxenberg seeks the following information:

- 1) All information, documents, and other materials received from Saint-Gobain Performance Plastics Corporation in response to the December 17, 2015 request from Nicoletta DiForte, Emergency and Remedial Response Division, United States Environmental Protection Agency Region II requesting information pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act. The letter was addressed to Edward J. Canning and requested information regarding the discovery of PFOA in the municipal water supply for the Village of Hoosick Falls. The responses were sent to Nicoletta M. DiForte of the Emergency and Remedial Response Division, U.S. Environmental. Protection Agency - Region II, with

**a copy to Amy Chester, Assistant Regional Counsel, Office of Regional Counsel, U.S. Environmental Protection Agency – Region II.**

For purposes of this request, “**document(s)**” is used in the broadest sense of the word under Rule 34 of the Federal Rules of Civil Procedure, and includes all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, electronic communications (existing in hard copy and/or in electronic storage), invoices, contracts, agreements, manuals, publications, photographs of all types, and mechanical, magnetic, and electronic records or recordings of any kind.

Should the EPA decide to charge a fee, Weitz & Luxenberg asks that the EPA obtain authorization from Weitz & Luxenberg before delivery of any materials. If the EPA refuses access to any of the requested records, please describe the materials it wishes to withhold and the statutory justifications for the refusal. Also, please state separately the EPA’s reasons for failing to invoke its discretionary powers to release the materials in the public interest.

If you have any questions about the scope of this request, or if you believe there are any ambiguities in the way Weitz & Luxenberg has framed its request, please let me know as soon as possible.

Weitz & Luxenberg looks forward to a response within twenty working days, as required under the FOIA, and will interpret any delay in response as a denial of this request. Thank you for your very prompt attention to this matter.

Sincerely,

Tyler Gardner  
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